

UNITED STATES FEDERAL COURT
District Of Columbia
Domestic Relations Juvenile Division

COMPLAINT

ADRIENNE HOWARD BURTON
PLAINTIFF

Case: 1:20-cv-02730 (F Deck)
Assigned To : Unassigned
Assign. Date : 9/21/2020
Description: Pro Se Gen. Civil

VS

CHILD PROTECTIVE SERVICES, DEPARTMENT OF HUMAN SERVICES – LOIS HAMMOND/SW, VONDA COLEMAN/SW, Cheryl Williams, SENTARA NORFOLK GENERAL HOSPITAL – Juliana D. Martins, MD; CHRISTIAN CAROLINA AIMEE, MD, RESIDENT; DILLER Susannah P, MD; BANKS MELISSA M, RN; SPIEGEL MD, DAVID RICHARD; BARTIMOCCIA MD, MICHELLE L; Dr. Higinio Hanna; Marie Michelle, MD RESIDENT; Social Work- Kelli Bailey; RN - K, Saunders; Attorney GAL Bruce Sams, GAL Katherine Currin, Attorney Leslie Robinson, Attorney B. Cullen Gibson, Attorney Tamele Y. Hobson, Attorney Tiffany Crawford, Attorney Kelly Vasta, 741 Monticello Ave. Norfolk, VA 23510; 600 Gresham Dr. Norfolk, VA 23507, 208 E. Plume St #210, Norfolk, VA 23510, 101 Northfield St. Suite B Chesapeake, VA 23320, Dominion Tower, Suite 435 999 Waterside Drive Norfolk, VA, 555 E. Main Street Suite 1401 Norfolk, VA 23510 & 125 Saint Paul's Blvd #504 Norfolk, VA 23510, 810 Union Street, Suite 900 Norfolk, VA 23510, 208 E. Plume St. Ste 9 Norfolk, VA 23510, 500 East Plume St. Suite 220 Norfolk, VA 23510, Judge Mark Davis; 600 Granby St. Norfolk, VA 23510

DEFENDANT

Comes Now, the PLAINTIFF Adrienne Howard Burton PRO SE LITIGANT is bringing forth the following causes of action and alleges of the following:

1. Plaintiff Is A Individual and Residents of Little Rock, Arkansas, USA
2. Defendant is a Corporation and at the time of this complaint, a resident of Norfolk, VA, USA
3. On October 4, 2019 The Plaintiff went into the hospital due to leakage from the Plaintiff Vulva, but in no pain, yet was having a lot of contractions. The Plaintiff and her daughter AB came into the hospital on September 4, 2019 at approximately 12:30am to possibly have a baby, while traveling on her way back home to Little Rock, Arkansas.

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Count 1 – Negligence

Plaintiff was visiting the state of Virginia, her water broke on her way back home to Arkansas, however she came into the hospital out of concern for her unborn child. The plaintiff arrived at Sentra The General Hospital on September 4, 2019 at approximately 12:30am to possibly give birth to baby NH. **Exhibit 1A, 1B, 1C**

Count 2 - Negligence

False Accusations, Defamation of Character, Court document states the children were removed from the home on 9/4/2019. The Plaintiff isn't a residents of the state of Virginia, nor has a home in the state of Virginia. **Exhibit 2A, 2B**

Count 3 - Negligence

Failed, The Plaintiff was informed that she needed to be treated for GBS+ , Yet, staff failed to actually present results to the test, meaning test results hadn't been tested in the lab yet, The plaintiff arrived on the September 4, 2019 at approximately 12:30am to possibly give birth to baby NH. Furthermore, the Plaintiff was treated with Penicillin and acyclovir right before given birth to NH on September 5, 2019 at approximately 8 Pm. **Exhibit 3A**

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Count 4 - Negligence

Failed, CPS Lois Hammond Warner came into the hospital and took the plaintiff daughter AB on an Seventy-two hour hold for the birth of the Plaintiff unborn child NH. Yet, NH was also taken from the hospital by DHS stating that the patient's care was complicated by complex social situation, social work and psychiatry were consulted. Per psychiatry, the patient's mother "lacks decision making capacity to refuse treatment as a decision making based on delusion. Yet, the Plaintiff eventually agreed to be treated on September 5, 2019 with Penicillin and acyclovir right before given birth. However, staff didn't bother to ask if the Plaintiff had been treated for GBS+ in the past for the pregnancy. "TDO was put in place on 9/4 Per Norfolk CPS, "TDO to treat against patient will " yet an emergency removal order was put in place, infant was discharged into foster care. **Exhibit 4A, 4B, 4C, 4D, 4E**

Count 5 - Negligence

Failed, Louis Hammond failed to follow the CPS Manuel – According, to the National CPS Manuel a judge would have to sign off on a court order to remove a child from a parent/home..

Exhibit 5A

Count 6 - Negligence

False allegations, Plaintiff was given a pamphlet about the services offered, stating Physical Neglect and Inadequate Supervision. However, Inadequate Supervision isn't one of the four types of child abuse. AB was being supervised by her mother Adrienne Howard Burton. **Exhibit 6A, 6B, 6C**

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Count 7 - Negligence

CPS Failed, DHS failed to listen to the Plaintiff, when the Plaintiff told them that her husband has a background of being incarcerated/convicted felon with a history of drug abuse, reckless driving, Aggravated Assaults, Drugs and firearms, simultaneous POS of FY, Manufacture deliver possess controlled substance scheduled 1,2 < 28g Narcotic meth FY, Possess use Deliver Advertise Drug Paraphernalia FC, Possess Firearm by certain persons FD, and also is a Mental Health patient. Yet, he has been visiting the children at DHS/CPS in Norfolk, VA. The plaintiff and her husband are currently going through a divorce, the Plaintiff wasn't aware of the charges Mr. Burton has on his record until the Plaintiff began to do research on Mr. Burton due to martial issues, which also include mental health issues. **Exhibit, 7C, 7B**

Count 8 -- Negligence

Failed, Psychiatric Services were given to the plaintiff against the plaintiff will, leaving a bill of \$535.00 to pay for services rendered. The Plaintiff doesn't have a history of Mental Illness nor has a criminal history. **Exhibit, 8A, 8B, 8C**

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Count 9 - Negligence

False Allegations, Caroline Christian, MD Co-signed by Susannah P. MD, Resident Christian, Caroline MD, RES stated that the Plaintiff had no prenatal care. Also stated that Newborn of maternal carrier of group B Diagnosis was GBS + Group B Streptococcus, and that Plaintiff /mother was not treated prophylactically. Yet, the Plaintiff was treated at UAMS with an antibiotic called - Keflex 500mg Qid, Amoxicillin 500mg for GBS+ Group B Streptococcus.. However, due to the patient being given to many antibiotics during the pregnancy with the infant child NH began persistent tachypnea. Leading NH to be transferred to Special Care Nursery for further evaluation and observation for suspected sepsis. **Exhibit 9A**

Count 11 - Negligence

Failed, Neglect, CPS/DHS has had the plaintiff children since September 4, 2019, the plaintiff only seen her children by supervised visits two times in the month of October 2019. however, CPS/DHS was told that the plaintiff isn't a resident of the state and that the Plaintiff would have to return home to keep from getting sick after having a baby. **Exhibit 11A**

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Count 12 - Negligence

Failed, Neglect, The Plaintiff wasn't informed of shots given to AB that the child has already been given in the past, which are: *diphth/pertussis, acel/tetanus/ polio 0.5 mL, route IM; measles/mumps/rubella/varicella vacc 0.5 mL route subcutaneous; route IM, AB shot record is up to date. However, the affects of given a child the shot twice could result in the child having seizures, problems breathing and death could occur. However, the shot Influenza 0.5 ml was given without the mothers consent, yet, DHS/CPS doesn't know moms health status, which they failed to realize that many children given the shot Influenza has resulted in death or became ill from being given the shot not knowing if the child is allergic to the shot. Exhibit 12A, 12B, 12C*

Count 13 - Negligence

Failed, According to, the photo I screen vision Digital Vision Screening Technology that AB was given, stated that AB is Borderline Nearsightedness. Yet the document from the clinic stated that AB has a language delays, meaning AB can't state wether or not the child could actually see the objects on the screen. **Exhibit 13A, 13B**

Count 14 - Negligence

Failed, neglect to apply oil to the Plaintiffs children NH and AB skin while in foster care.

Exhibit 14A

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Count 15 - Negligence

False Allegations, Communicated on the document that Christian Caroline Aimee wrote there was Physical abuse affecting pregnancy, stating that the Plaintiff reported that her husband attempted to kill her while driving, by being kicked in her abdomen. **Exhibit 15A**

Count 16 - Negligence

Failed, Violation of patients rights, the right to be treated with dignity and respect and not as a psychiatric patient. Simply out of respect for the Plaintiffs pregnancy and the situation at hand, which was leakage from the Plaintiffs Vagina. **Exhibit 16A**

Damages

Wherefore, Adrienne Howard, Pro Se Litigant, seeks to bring her children AB and NH home and also seeks compensatory damages in the amount of \$23 Billion dollars for pain and suffering together with attorney fees and court cost.

Respectfully Submitted,

S/ 

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